

This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

MP106 'CHISM update for Unknown WAN Variant'

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP106 Refinement Consultation.

Question 1: Do you agree with the solution put forward?

Question 1			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	No	E.ON believes this is an unnecessary change and will result in needless additional costs being incurred.
Western Power Distribution	Networks Party	Yes	We agree that the proposed solution sounds reasonable and will provide better clarity for Suppliers.
Utilita	Large Supplier	Solution seems reasonable and straightforward although we are finding it difficult to support this modification as the cost of implementation seems to be excessive.	Looking at the cost alone it appears that DCC has built a testing regime that is not fit for purpose, if a small change like this has such a cost behind it. It raises questions about the robustness of the DCC System for any other implementations in the future.

Question 2: Will there be any impact on your organisation to implement MP106?

Question 2			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	Yes	E.ON will have to invest money and resources to change our systems. Our systems are working effectively using the WAN Variant “ (Space). We do not agree changing a working system with little benefit is cost efficient. We also believe the DCC modification costs of £150,000 will be better spent in other areas.
Western Power Distribution	Networks Party	No	No comment.
Utilita	Large Supplier	N/A	No comment.

Question 3: Will your organisation incur any costs in implementing MP106?

Question 3			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	Yes	We do not have a cost value at this stage, but we can confirm this will provide no cost savings or benefit.
Western Power Distribution	Networks Party	No	No comment.
Utilita	Large Supplier	N/A	No comment.

Question 4: Do you believe that MP106 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	No	For reasons noted above.
Western Power Distribution	Networks Party	Yes	We believe that this modification would better facilitate SEC Objectives (a) and (g).
Utilita	Large Supplier	Yes	The solution proposed will add further clarity for Suppliers.

Question 5: Noting the costs and benefits of this modification, do you believe MP106 should be approved?

Question 5			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	No	For reasons noted above.
Western Power Distribution	Networks Party	N/A	Whilst we are likely minded to approve this modification we would challenge the costs for such a minor change. Please also see comments under Question 10.
Utilita	Large Supplier	No	Given the costs for implementation, perhaps it is worth investigating alternative solutions to deliver similar benefits. For example, a wording change in documentation which explains that “ “ should be read as: ‘Unknown’ might be just as useful. The cost should be more proportionate to the benefit.

Question 6: How long from the point of approval would your organisation need to implement MP106?

Question 6			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	Currently we believe this will take up to six months.	No comment.
Western Power Distribution	Networks Party	N/A	No comment.
Utilita	Large Supplier	N/A	No comment.

Question 7: Do you agree with the proposed implementation approach?

Question 7			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	No	As noted above we do not believe this should be implemented.
Western Power Distribution	Networks Party	No	Whilst we understand the reasons given we would challenge the change being delayed when it forms part of the install process. We would challenge whether this should be implemented earlier to assist the roll out.
Utilita	Large Supplier	N/A	No comment.

Question 8: Do you agree that the legal text will deliver MP106?

Question 8			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	Yes	No comment.
Western Power Distribution	Networks Party	Yes	No comment.
Utilita	Large Supplier	Yes	No comment.

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP106 is implemented?

Question 9			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	No	This will not benefit customers as it will incur additional unnecessary costs within the industry.
Western Power Distribution	Networks Party	Yes	The solution proposed in the modification would assist Suppliers in understanding exactly what the situation is on site and therefore ensure that the Consumer have the correct expectations when an installation is booked.
Utilita	Large Supplier	No	No comment.

Question 10: Please provide any further comments you may have

Question 10		
Respondent	Category	Comments
E.ON	Large Supplier	No comment.
Western Power Distribution	Networks Party	<p>As mentioned previously we would like to understand exactly where the costs stem from as they seem quite large for a seemingly minor change.</p> <p>We would also like clarification around the Business Requirements in the DCC PIA. There are two Business Requirements detailed in the Modification Report, however there is only one within the DCC PIA and this requirement is slightly different.</p> <p>The requirement within the DCC PIA mentions DSP, however everything else is relating to CSP C&S. We would like to better understand exactly where the change is required, i.e. do CSP need to make changes or can DSP just provide amended wording to the User and the costs associated with each.</p>
Utilita	Large Supplier	No comment.